

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS LIABILITY** *
LITIGATION * **MDL No. 19-md-2875-RMB-SAK**

THIS DOCUMENT RELATES TO *
Lana Dufrene, 1:19-cv-15633 *

MOTION TO SUBSTITUTE PARTY PLAINTIFF

NOW INTO COURT, through undersigned counsel, comes Heather Guidroz, who respectfully moves this Court for an order substituting Heather Guidroz as party plaintiff for Lana Dufrene, her deceased mother for the following reasons:

1.

The above captioned lawsuit was filed on July 19, 2019 by Lana Dufrene.

2.

Plaintiff Lana Dufrene passed away on July 8, 2022 during the pendency of this action, as reported to this Court in the attached Suggestion of Death filed by Heather Guidroz, on January 17, 2025 (Exhibit 1).

3.

Heather Guidroz, as surviving daughter of Lana Dufrene, is the proper party to substitute as party plaintiff in this matter pursuant to Federal Rules of Civil Procedure Rule 25(a)(1) and Louisiana Civil Code article 2315.1. Ms. Guidroz is the only heir with the right of action to proceed, as she is Mrs. Dufrene's only surviving child, and her mother, Lana Dufrene, was

divorced at the time of her death. Accordingly, Heather Guidroz has the proper capacity to proceed forward with the surviving products liability lawsuit.

WHEREFORE, Heather Guidroz respectfully requests that she be substituted as party plaintiff on behalf of Lana Dufrene, her deceased mother.

Dated: February 20, 2025

Respectfully submitted,

/s/ M. Palmer Lambert

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CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2025, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record who are CM/ECF participants.

/s/ M. Palmer Lambert

M. Palmer Lambert